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IN THE UNITED STATES DISTRICT COURT

THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

NORA BOROWSKY, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

TREE TOP, INC.,

Defendant.

Case No. 3:25-cv-05533-RFL

**SECOND JOINT STIPULATION
SETTING BRIEFING SCHEDULE ON
RESPONSE TO COMPLAINT;
[PROPOSED] ORDER**

Assigned to the Hon. Rita F. Lin

Pursuant to Civil Local Rules 6-2(a) and 7-12, Plaintiff Nora Borowsky (Plaintiff) and Defendant Tree Top, Inc. (Tree Top) (together with Plaintiff, the Parties) hereby stipulate and request as follows:

1. On July 1, 2025, Plaintiff filed her Complaint. (ECF No. 1.)
2. On July 22, 2025, the Parties stipulated to an extension of time for Tree Top to respond to Plaintiff's Complaint from July 30, 2025, to August 29, 2025. (ECF No. 12.)
3. On August 21, 2025, the Parties filed their First Joint Stipulation Setting Briefing Schedule on Response to Complaint. (ECF No. 16.)
4. On August 25, 2025, the Court granted the Parties' First Joint Stipulation Setting Briefing Schedule on Response to Complaint, as modified. (ECF No. 17.) The Court ordered Tree Top to file its response to the Complaint by September 16, 2025, Plaintiff to file any opposition by October 14, 2025, and Tree Top to file its reply by November 4, 2025.
5. On September 12, 2025, counsel for Tree Top contacted Plaintiff's counsel to request a one-week extension of the briefing schedule on Tree Top's anticipated motion to dismiss the Complaint in order for Tree Top and its counsel to finish their factual investigation of the allegations in the Complaint. (Declaration of Peter K. Bae (Bae Decl.) ¶ 2.) Plaintiff's counsel agreed to the requested briefing schedule. (*Id.*)
6. Good cause exists to extend the deadlines for Tree Top's response, Plaintiff's response, and Tree Top's reply in order to allow Tree Top and its counsel to finish their factual investigation of the allegations in the Complaint. (Bae Decl. ¶¶ 2–3.)
7. This stipulated request will not affect any other event or deadline in this case. (Bae Decl. ¶ 4.)
8. This is the Parties' second stipulated request for a briefing schedule. The Parties previously stipulated to two extensions of time for Tree Top to respond to the Complaint. (ECF Nos. 12, 16.) The Court has not stated that further extensions will not be granted. (Bae Decl. ¶ 5.)

9. Therefore, the Parties respectfully request that this Court enter the following briefing schedule on Tree Top's response to Plaintiff's Complaint:

<u>Event</u>	<u>Proposed Deadline</u>
Tree Top's Response to Complaint	September 23, 2025
Plaintiff's Opposition to Tree Top's Response to Complaint, if any	October 21, 2025
Tree Top's Reply in Support of Response to Complaint, if any	November 7, 2025

Dated: September 12, 2025

BURSOR & FISHER P.A.

By: /s/ Joshua Glatt
Joshua Glatt

Attorneys for Plaintiff Nora Borowsky

Dated: September 12, 2025

DAVIS WRIGHT TREMAINE LLP

By: /s/ Peter K. Bae
Peter K. Bae

Attorneys for Defendant Tree Top, Inc.

FILER'S ATTESTATION

I, Peter K. Bae, am the ECF user whose identification and password are being used to file this stipulation on behalf of the parties. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: September 12, 2025

DAVIS WRIGHT TREMAINE LLP

By: /s/ Peter K. Bae

Peter K. Bae

Attorneys for Defendant Tree Top, Inc.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September __, 2025

HON. RITA F. LIN
United States District Judge